

(#179098 V1 - FASHION WORLD V. ZIARI INITIAL DISCLOSURE)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
FASHION WORLD, LTD.,

07-CV-6108

Plaintiff,

-against-

**JEFF GREEN, ZIARI INTERNATIONAL, LTD.,
US MERCHANTS FINANCIAL GROUP, INC.,
THE MERCHANT OF TENNIS, INC., LISA
NUNZIATA and METAMORPHOSIS, INC.,**

**“GREEN DEFENDANTS”
INITIAL
DISCLOSURE**

Defendants,

-and-

DARRYL MAYNARD, PING LEUNG and ALEX CHANG,

Additional Cross-Claim Defendants,

-and-

BRUNO CONDI and FORTUNA VALENTINO,

Additional Counterclaim Defendants.

-----X
FASHION WORLD, LTD.,

Plaintiff/Counterclaim-Defendant/Third-Party Plaintiff,

-and-

BRUNO CONDI and FORTUNA VALENTINO,

Counterclaim-Defendants/Third-Party Plaintiffs,

-against-

**JUSTIN L. ROSENBLATT, JR., a/k/a SKIP
ROSENBLATT and ROSENBLATT, INC.,**

Third-Party Defendants.

-----X

(#179098 V1 - FASHION WORLD V. ZIARI INITIAL DISCLOSURE)

Defendants, Jeff Green, Ziari International Ltd., US Merchants Financial Group Inc. and the Merchant of Tennis, Inc (collectively, the “Green Defendants”) by their attorneys Heller, Horowitz & Feit, P.C., as and for their Initial Disclosure pursuant to FRCP 26(a)(1), state as follows:

1. *Names of Individuals with Discoverable Information.*

- | | |
|----------------------|-------------------|
| a. Jeff Green | e. Darryl Maynard |
| b. Bruno Condi | f. Lisa Nunziata |
| c. Fortuna Valentino | g. Ping Leung |
| d. Justin Rosenblatt | h. Alex Chang |

These individuals have knowledge of the License Agreement and the conduct of the parties thereunder, as well as any modifications of the License Agreement and other agreements and understandings among the parties with respect to the sale and distribution of goods bearing the subject trademark.

2. *Description of Supporting Documents.*

The Green Defendants have records relating to their sale of goods bearing the subject trademark.

3. *Categories of Damages.*

The damages claimed by the Green Defendants are set forth in their Answer, Cross-Claims and Counter-Claims.

4. *Insurance Agreements.*

There are no applicable insurance agreements.

(#179098 V1 - FASHION WORLD V. ZIARI INITIAL DISCLOSURE)

This Disclosure is based upon information currently available to the Green Defendants, which reserve the right to amend, modify and/or supplement this Disclosure.

Dated: New York, New York
December 27, 2007

HELLER, HOROWITZ & FEIT, P.C.

By. 

Stuart A. Blander (SB-2510)

Attorneys for the Green Defendants

292 Madison Avenue

New York, New York 10017

(212) 685-7600

Fax: (212) 696-9459